

The Roadrunners Microwave Group (RMG) was established in the south central US several years ago as a specialist group to promote activity and research on the amateur bands above 420 MHz. We now have over thirty members including several as far away as Florida. Our members include engineers, physicists and others active in the fields of commercial communications and electronics development. We have been successful in promoting activity and research in all the higher bands from 420 MHz up through 24 GHz using narrow band techniques and other weak signal modes. One result of our efforts was two of our members established a new distance record on the 2304 MHz between Texas and Florida, a feat never before accomplished. Much of our liaison work is done on 432 MHz. We consider this band important. Therefore RMG, wishes to express in the strongest terms our concern over the Commission's possible intention to permit RF Identification Devices (RFID's) to operate in this band under the conditions proposed in the Docket. Such operation poses a major threat to weak signal and satellite work in the 432-435 MHz portion of the band. Portions of the spectrum already allocated to RF heating devices or microwave ovens where such use is already satisfactorily accommodated would seem to be a more appropriate place to consider placing radiation from these devices. Any argument that we must follow the lead of other countries in where to allow these devices to operate seems weak in that these devices will rarely be used across borders. If the proceeding called for restricted use of these devices in areas away from populated areas, it could reduce the risk of noise interference, but no such limitation is contained in the proceeding. Any argument that these devices are already in use in military installations or other places in the US without interference is not credible since many sources of interference exist without yet being properly identified as to source. Allowing these devices to raise the interference floor on the 420-450 band is like adding an identified smoke source to the atmosphere so you won't look for the ozone sources. As a final comment, one wonders how much research SAVI, the manufacturer has done to reduce signal strengths or raise data rates to reduce the on-air interference time. It would seem that these approaches should be documented before the Commission makes its decision. In the absence of these efforts we encourage the Commission to reject the SAVI proposal.

Respectfully submitted:

Robert J. Templin P.E., W5OE
President RMG